

FILED

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

AUG -6 AM 9:28
U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
CLEVELAND

RAYMOND BRYANT

Plaintiff,

vs.

ALLIED UNIVERSAL SECURITY SERVICES

Defendants,

1:18 CV 1800

JUDGE BOYKO

COMPLAINT

Plaintiff, Raymond Bryant, alleges:

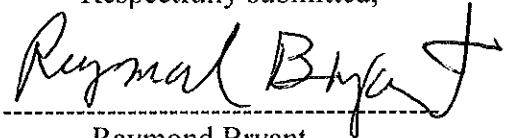
1. This action is brought on behalf of, Raymond Bryant to enforce the provisions of Americans with Disabilities Act, (ADA), 42 U.S.C.S. § 12101-12117et. Seq., Subchapter I as it relates to employment.
2. The Court has jurisdiction of this action under 28 U.S.C. § 1331et.seq.
3. Defendant Allied Universal Private Security Corporation operates in the City of Cleveland, Cuyahoga County and the State of Ohio.
4. The Allied Universal Private Security Corporation has responsibility, among other things, for the selection, hiring, employment, discipline and termination of Private Security Personnel.
5. Allied Universal Private Security Corporation is a person within the meaning of 42 U.S.C. Section 12111 (7) and an employer or an agent of an employer within the meaning of 42 U.S.C.S. § 12111 (5) (A) et seq and 42 U.S.C.S. § 12111(7).
6. Allied Universal Private Security Corporation has discriminated against Raymond Bryant in violation of 29 C.F.R. § 1630.2(o)(3) among other ways by failing or refusing to make reasonable accommodations to the known physical or mental limitation (s) of an otherwise qualified employee suffering from lack of blood flow to the brain while in the service of the defendant.
7. Plaintiff alleges further, by the employer's failure to engage in an interactive process despite plaintiff's superior public law enforcement experience, resulted in a failure to identify an appropriate accommodation for a qualified individual.
8. Plaintiff suffered an adverse employment action when the employer disregarded the medical evaluation and plaintiff's prior notice for reassignment altogether and rather than collaborate with Plaintiff's doctor, plaintiff or schedule a fit for duty examination to seek further clarification to find a reasonable accommodation, the employer chose to turn a blind eye and terminate plaintiff.

WHEREFORE, Plaintiff prays that the Court grant the following relief:

(a) Enjoin the Allied Private Security Corporation, as appropriate, from failing or refusing to provide sufficient equitable relief to make whole Raymond Bryant for the loss he has suffered as a result of the discrimination against Plaintiff as alleged in this Complaint;

(b) Award compensatory and punitive damages for violations of 42 U.S.C.S. § 12112(b) (5), against Defendant/Respondent, as allowed in 42 U.S.C.S. § 1981 a (b), in addition to any relief authorized by the Civil Rights Act of 1964 § 706(g), 42 U.S.C.S. § 2000e-5(g), from the respondent.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Raymond Bryant", written over a horizontal dashed line.

Raymond Bryant
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